

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Mailing Online Service, 1998 )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: MICHAEL K. PLUNKETT  
(OCA/USPS-T5-15-16)  
(July 30, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

*Gail Willette*

Gail Willette  
Acting Director  
Office of the Consumer Advocate

*Emmett Rand Costich*

Emmett Rand Costich  
Acting Assistant Director



OCA/USPS-T5-15. Please refer to USPS-T-5, Exhibit B.

- a. For 1999, please confirm that you assumed all "Letter Size Pieces" (260,096,523) and all "Flat Size Pieces" (35,538,936) will be mailed in envelopes. If you do not confirm, please explain.
- b. Please explain the difference between the "Total Envelopes" of 295,635,459 (260,096,523+35,538,936) and the "Total Pieces" of 295,665,025 in USPS-T-2, Exhibit A, Table 4, line (1).

OCA/USPS-T5-16. Please refer to USPS-T-5, Exhibit B, page 1.

- a. For 1999, please confirm that the figure \$39,648,674, "Impression Costs," was derived from the following formula:

=+'A:\Mailing Online\[pwm3.xls]Impression Costs'!D\$36-'A:\Mailing Online\[pwm3.xls]Impression Costs'!D\$13-'A:\Mailing Online\[pwm3.xls]Impression Costs'!D\$23-'A:\Mailing Online\[pwm3.xls]Impression Costs'!D\$33

If you do not confirm, please explain.

- b. Please confirm that the formula in part (a) of this interrogatory refers to the file "pwm3.xls" that is located on a 3.5 inch diskette and can be accessed only from the A: drive of a computer. If you do not confirm, please explain.
- c. For 1999, please confirm that the figure 974,425,779, "Pages printed on 8.5x11 paper," was derived from the following formula:

=+'A:\Mailing Online\[MOL7\_13.xls]Volumes'!D\$57+'A:\Mailing Online\[MOL7\_13.xls]Volumes'!D\$90

If you do not confirm, please explain.

- d. Please confirm that the formula in part (c) of this interrogatory refers to the file "MOL7\_13.xls" that is located on a 3.5 inch diskette and can be accessed only from the A:drive of a computer. If you do not confirm, please explain.
- e. Please confirm that the figure \$44,258, transportation costs for "First-Class letters," is derived from the following formula:
- =+D17\*'A:\Mailing Online\[pwm3.xls]Transportation  
Costs!E\$186\*'P:\PRICING\MOnline\[RSRCHVOL.XLS]1999  
projections!\$B\$6/'P:\PRICING\MOnline\[RSRCHVOL.XLS]1999  
projections!\$B\$5
- If you do not confirm, please explain.
- f. Please confirm that the formula in part (e) of this interrogatory refers to the file "RSRCHVOL.XLS," that is located on the p:drive of a computer. If you do not confirm, please explain.
- g. Please provide electronic versions of your exhibits (i.e., Excel files) that contain cell formulas referencing files on the A:drive only.
- h. Please provide a 3.5 inch diskette containing all files referenced in the Excel spreadsheets requested in part (g) of this interrogatory.

#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
Emmett Rand Costich  
Attorney

Washington, D.C. 20268-0001  
July 30, 1998